

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Derek Sincere Black Wolf Cryer

Plaintiff,

CIVIL ACTION

v.

NO. 1:05-cv-11289

Kathleen Dennehy, Michael Thomson,
Carol Mici, Greg McCann, Tina Ranno,
Mae Robinson, Greg Poladian
Tom Lavelle, William Taylor

Defendants,

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S MOTION
FOR A PRELIMINARY INJUNCTION

U.S. DISTRICT COURT
CLERK'S OFFICE
FILED
2006 JUN - 5 PM
3:30 PM
S: [Signature]

Derek Sincere Black Wolf Cryer declares under penalty of perjury:

- 1). I am the Plaintiff in this case. I make this affidavit in support of my motion for a preliminary injunction so that I may practice my Spirituality (Religion) and preserve my constitutional rights.
- 2). As set forth in the original complaint and supplemental complaint, agents of the Massachusetts Department of Corrections (MDOC) have prohibited me access to several Native Spiritual (Religious) Items which are crucial and necessary to my practice, and has denied my constitutional rights to practice my Spirituality according to the dictates of my conscience.
- 3). Beginning in February 2004 I was extremely harassed by Defendants Ranno, Robinson, and Poladian who would continuously deny me access to the locker in the Native Indian room where all the Sacred Teachings and Items were kept.
- 4). I filed several grievances against the Defendants and against the denied access to the Sacred Items/Teachings and because of it I was retaliated against and the conditions pertaining to the access to the Native locker in

12). For the reasons set forth in this affidavit, and for the reasons set forth in the Memorandum of Law filed with this motion, the Plaintiff is entitled to a preliminary injunction requiring Defendants to carry out the requests set forth in the Plaintiff's Motion for a Preliminary Injunction.

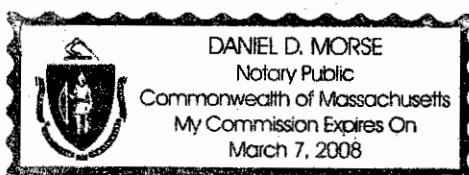
Respectfully submitted,

~~Derek Sincere Black Wolf Cryer, Pro se~~
~~Derek Sincere Black Wolf Cryer, Pro se~~
Derek Sincere Black Wolf Cryer, Pro se
MCI Shirley Medium
P.O. Box 1218 - Harvard Road
Shirley, MA. 01464

Sworn to before me this _____ day
of _____, 2006.

Dan Morse, Notary Public

CC: file/6-1-06



Commonwealth of Massachusetts }
County of Middlesex } ss.
} ss.

On this the 2nd day of June, 2006 before me Daniel Morse, the undersigned Notary Public,

Personally appeared Derek Cryer, and proved to me through satisfactory evidence of identity, which was MA DOC Inmate ID to be the person whose name was signed in my presence, and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

Dan D. Morse
Notary Public